

**Subject:** Re: Jermaine Cooper extension request  
**Date:** Wednesday, November 13, 2024 at 11:06:48 AM Eastern Standard Time  
**From:** Gabriel Harvis  
**To:** Byrne, Christopher  
**CC:** Michael Gluck, Baree Fett  
**Attachments:** image001.png, image002.png, image003.png, image004.png, image005.png, image006.png, image007.png, image008.png, image009.png, image010.png

Good morning Christopher,

I hope all is well. Given the City's October 31, 2024 letter, it appears that removal of this action was improper because it was done without the consent of all defendants in violation of 28 U.S.C. 1446(b)(2)(a). Accordingly, we request that your office consent to remand. Please advise by close of business tomorrow whether your office will consent. If we have not received your consent by that time, we will be filing a motion for remand and also requesting relief in accordance with 28 U.S.C. 1447(c) ("An order remanding the case may require payment of just costs and any actual expenses, including attorney fees, incurred as a result of the removal.").

Thank you,  
Gabe



Gabriel P. Harvis  
Partner / Co-Chair, Civil Rights Division

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**From:** Byrne, Christopher <Christopher.Byrne@ag.ny.gov>  
**Date:** Wednesday, October 23, 2024 at 10:50 AM  
**To:** Gabriel Harvis <gharvis@eeplaw.com>  
**Cc:** Michael Gluck <mgluck@eeplaw.com>, Baree Fett <bfett@eeplaw.com>  
**Subject:** RE: Jermaine Cooper extension request

Much appreciated thanks.

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**From:** Gabriel Harvis <gharvis@eeplaw.com>  
**Sent:** Wednesday, October 23, 2024 10:49 AM  
**To:** Byrne, Christopher <Christopher.Byrne@ag.ny.gov>